## GOVERNMENT OF THE DISTRICT OF COLUMBIA STATE HISTORIC PRESERVATION OFFICER



December 4, 2013

Mr. Marcel Acosta Executive Director, National Capital Planning Commission 401 9<sup>th</sup> Street, NW North Lobby, Suite 500 Washington, DC 20004

RE: Initiation of Section 106 Consultation; Carnegie Library (aka Central Public Library) Redevelopment for Use as the Spy Museum and Other Purposes; 801 K Street, NW

Dear Mr. Acosta:

Thank you for formally initiating consultation with the DC State Historic Preservation Office (SHPO) regarding the above-referenced undertaking, which we understand will consist of review and approval of the project by the National Capital Planning Commission (NCPC) in accordance with the National Capital Planning Act. We have reviewed the project information and are writing to provide our initial comments regarding effects on historic properties in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800.

As outlined in the submittal and presented in the agency scoping meeting held at NCPC on November 20, 2013, we understand that the proposal includes renovation of the Carnegie Library and construction of an above and below-grade addition on the north side of the building which will also extend to the east and west of the library. The purpose of the renovation and new construction is to provide additional space for the relocated Spy Museum, the Washington Historical Society, a new DC visitor's center, café and retail functions and related uses. Mount Vernon Square will also be substantially redesigned to introduce areas specifically for outdoor dining, cultural exhibits, performances, active and passive recreation and the like. Once the project is complete, the Spy Museum is to be gifted to the community as a 501(c)(3) nonprofit organization in exchange for the creation of this permanent home for the museum.

The Carnegie Library, originally known as the Central Public Library, is a beautiful Beaux Arts building that was gifted to the city by Andrew Carnegie in 1899, designed by the architectural firm of Ackerman & Ross, and constructed between 1901 and 1902. The building was listed in the DC Inventory of Historic Sites on November 8, 1964 and the National Register of Historic Places on December 3, 1969. The National Register nomination describes the library as a building which "...contributes significantly to the cultural heritage and visual beauty of the District of Columbia," and identifies Mount Vernon Square as "...one of fifteen major squares on L'Enfant's 1791 plan of Washington." Planned views to and from the building and the square along Massachusetts and New York Avenues, as well as from K and 8<sup>th</sup> Streets, NW are critically important aspects of the L'Enfant Plan. For these reasons, the significance of the building and its site should be given very serious consideration in the Section 106 process and we fully concur with NCPC's initial finding that there is potential for the undertaking to result in an adverse effect on the Carnegie Library, the Mount Vernon Square, the L'Enfant Plan and other historic properties. In fact, we believe the adverse effect will likely be unavoidable unless an alternative site is selected for the project.

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In addition to the Carnegie itself, we note that NCPC's proposed Area of Potential Effects (APE) includes numerous other historic properties that should also be considered when evaluating the effects of the proposed undertaking. We concur that the proposed APE should be sufficient to take those effects into account, but recommend that the aforementioned views be specifically identified with ellipses on the map to indicate that the views continue along the indicated avenues and street. The APE can be revised, if necessary, as consultation continues. We also note that a Phase IA survey will be conducted in consultation with our office to address the potential for archaeological resources that may need to be considered during consultation. Finally, we concur with the draft list of consulting parties and request to be notified of any additional parties who may request to participate.

We look forward to consulting with all parties to continue the Section 106 review of this project. Since the Carnegie Library is a DC landmark, the project will also require review by the DC Historic Preservation Review Board (HPRB). The public hearing held as a part of the HPRB review process can provide additional opportunities for consulting parties to express their views on the proposal.

If you should have any questions or comments regarding this matter, please contact me at <a href="mailto:andrew.lewis@dc.gov">andrew.lewis@dc.gov</a> or 202-442-8841. Questions or comments relating to archaeology should be directed to Ruth Trocolli at <a href="mailto:ruth.trocolli@dc.gov">ruth.trocolli@dc.gov</a> or 202-442-8836. Thank you for providing this initial opportunity to review and comment.

Sincerely,

Senior Historic Preservation Specialist

DC State Historic Preservation Office

13-613

cc: Greg O'Dell, Events DC Jennifer Hirsch, NCPC